Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

REQUESTS BY PROGENY LMS, LLC, FCR, INC., HELEN WONG-ARMIJO, AND PCS PARTNERS, L.P. FOR WAIVER AND EXTENSION OF TIME TO CONSTRUCT 900 MHZ MULTILATERATION LOCATION AND MONITORING SERVICE LICENSES	WT Docket No. 12-202

Via the ECFS

COMMENTS OF IEEE 802

1. IEEE 802[1] respectfully submits its Comments in the above-captioned Proceeding[2].
2. IEEE 802, as a leading consensus-based industry standards body, produces standards for wireless networking devices, including wireless local area networks ("WLANs"), wireless personal area networks ("WPANs"), wireless metropolitan area networks ("Wireless MANs"), and wireless regional area networks ("WRANS"). Included in our standards development activity is an emphasis on coexistence, which is the focus of our Wireless Coexistence working group. We appreciate the opportunity to provide these comments to the FCC.

INTRODUCTION

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3. Since IEEE 802, through the work of the IEEE 802.18 Radio Regulatory Technical Advisory Group ("RR-TAG"), has previously submitted comments related to LMS construction requirements, most recently in the matter of a Request by Progeny LMS, LLC For Waiver of Location and Monitoring Service (LMS) Construction Rule, WT Docket No. 08-60, we believe our comments related to this proceeding will be useful to the Commission

1 The IEEE Local and Metropolitan Area Networks Standards Committee ("IEEE 802" or the "LMSC").

2 This document represents the views of IEEE 802. It does not necessarily represent the views of the IEEE as a whole or the IEEE Standards Association as a whole.

in resolving the issues at hand.

4. We have a particular interest in the 902-928 MHz band, since the IEEE 802.11 Working Group ("802.11") is developing an amendment to the base standard for sub-1 GHz operation of WLANs targeting this band, and the IEEE 802.15 Working Group ("802.15") has completed an amendment to the IEEE 802.15.4 base standard for WPANs specifically targeted at Smart Grid applications in this band.

IEEE 802 BELIEVES M-LMS IS NO LONGER VIABLE AS A GEOLOCATION TECHNOLOGY GIVEN THE PRESENT MARKET CONDITIONS

5. The RR-TAG took the position that M-LMS technology is no longer viable considering current market conditions in its submission to WT 08-60 and IEEE 802 continues to support this view.
6. We continue to see no evidence that M-LMS services are viable technology offerings given the products currently available in the market place using low cost Global Positioning System ("GPS") alternatives for geolocation services in outdoor applications.
7. GPS location services have served the public interest in ways unimagined by the initial creators of the GPS technology. GPS services completely dominate the present geolocation market, especially in outdoor applications.
8. Indoor location services are currently available that use cellular mobile or Wi-Fi™ technology to improve performance in indoor environments, where GPS isn't always effective. These approaches use systems and infrastructure that is already widely available. Large scale deployment of Wi-Fi™ and cellular mobile equipment have already resulted in cost effective, widely deployed location-based services, and future development of application software is likely to improve present performance over time for indoor environments.
9. It is difficult for us to conceive of an M-LMS service using proprietary technology within a specialized spectrum allocation that could compete with services already available using presently available technology in licensed and unlicensed spectrum, or which could be economically created to address future needs in competition with low cost extensions of existing infrastructure and technologies.

CONCLUSION

10. IEEE 802 encourages the Commission reject these requests by Progeny et al for an extension of the construction deadlines.

Respectfully submitted,

/s/

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